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February 21, 2023

Via ECF

Hon. P. Kevin Castel
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

Application GRANTED.

SO ORDERED.

Dated: 2/22/2023

A handwritten signature in black ink, appearing to read "P. Kevin Castel".

P. Kevin Castel
United States District Judge

Re: *John Doe v. City of New York, et al.*, 22-CV-2690 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the "City"), assigned to the defense of the above-captioned matter. [I write to respectfully request permission to submit the concurrently filed "Exhibit A" under seal, in support of defendants' response to plaintiffs' pre-motion letter concerning discovery of February 7, 2023 (ECF No. 34) ("Plaintiff's Letter").] The next conference in this case is scheduled for March 31, 2023.

Today defendants filed their response to Plaintiff's Letter. ECF No. 38. Defendants respectfully request to submit under seal Exhibit A to ECF No. 38, filed concurrently and separately, pursuant to the Court's sealing and confidentiality orders at ECF Nos. 3 and 11. On February 7, 2023, Plaintiff filed the exhibits to the Plaintiff's Letter with a request to file under seal, including as plaintiff's Exhibit B excerpts from defendants' responses to plaintiff's discovery requests. The defendants' Exhibit A is a relevant excerpt from those same responses that was not included in plaintiff's Exhibit B, and the public filing of those excerpts could disclose information deemed confidential and sealed under the Court's prior orders.

We thank the Court for its consideration in this matter.

Respectfully submitted,
A handwritten signature in black ink, appearing to read "Alan H. Scheiner /s/
Alan H. Scheiner
Senior Counsel

cc (via ECF): All Counsel